

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Kimberly Boone	:	Chapter 13
	:	
Debtor	:	Case No.: 18-15468

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**MOTION FOR SPECIFIC RELIEF FROM THE AUTOMATIC STAY  
TO PROCEED IN DIVORCE PURSUANT TO 11 U.S.C §362**

The Debtor hereby moves this Court, pursuant to 11 U.S.C. § 362, for specific relief from the Automatic Stay provided under Section 362(a) as to all creditors to allow equitable distribution in divorce. In support of this motion, Debtor states as follows:

1. Kimberly Boone, hereinafter referred to as "Debtor," filed a petition under Chapter 13 Bankruptcy on or about August 18th, 2017.
2. The Bankruptcy case was numbered 18-15468.
3. In or about April, 2018, prior to the instant bankruptcy filing, the Debtor's soon to be ex-spouse, Zeradian Rochelle, filed for Divorce in the Court of Common Pleas of Philadelphia (April TERM, 2018 No.: 8402).
4. The Divorce proceedings were stayed due to the instant Bankruptcy filing.
5. At this time, the Debtor, the Defendant in the divorce matter, would like to finalize her divorce in State Court and obtain a final divorce decree.
6. As a result, the Debtor is seeking specific relief from the Automatic Stay to allow the divorce to proceed and finalize.
7. Although the Debtor is asking for permission to finalize her divorce, the Debtor's is not transferring any assets of the estate or gaining any assets that would be prejudicial to the Debtor's creditors.

8. In light of the above circumstances, it is respectfully requested that an Order be entered granting Specific Relief from the Automatic Stay, in order to allow the Divorce proceedings to conclude.

**WHEREFORE**, Debtor, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Granting specific relief from the automatic stay to allow the divorce to continue, and a divorce decree (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: March 8, 2019

/s/Brad J. Sadek, Esq

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